



RP

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September 15, 1988
RP:0095

Mr. F. W. Wanner
District Engineer (PODCO-O)
U.S. Army Corps of Engineers
Building 230
Ft. Shafter, Hawaii 96858

Dear Mr. Wanner:

U.S. Army Corps of Engineers
Proposed General Permit PODCO-O GP 88-2
Maintenance Access Ramps for Various Streams
Oahu, Hawaii

The proposed General Permit would allow the U.S. Army Corps of Engineers to construct 12 maintenance access ramps to 7 streams in the City and County of Honolulu and other streams not listed. The Environmental Center has conducted a brief review of the above referenced PODCO statement with the assistance of James Parrish, Hawaii Cooperative Fishery Research Unit; and Randall Rush, Environmental Center.

As stated in the notice the purpose of the general permit is to reduce delays, duplications, paperwork, and resource demands in preparing permit applications and in permit processing, and also to allow prompt action and efficient scheduling of these maintenance activities. However, issuance of a general permit is not necessary to achieve these goals. The individual permit system allows for these goals as long as one prepares in advance and also allows for proper environmental assessment of each project.

In Section 4a of the public notice, there is a description of two ramp types (I and II). The Type I ramps are designed for access at unimproved streams. A clearer understanding of the purpose for the ramp is necessary. We assume any access to an unimproved (natural) stream is for an action that could have a significant effect on the stream; this is a significant secondary concern. The Type II ramp is for access to existing improved streams, thus it should not lead to significant secondary effects.

Section 4b states a desire to authorize construction of maintenance access ramps in other streams not mentioned in Appendix A, subject to pre-authorization procedures described in paragraph 6d. This pre-authorization procedure mentions that eight agencies will be notified, but it does not mention what occurs if any agency objects to a project; it only mentions comments will be considered. Clarification of the action that will be taken and the options available to an agency questioning the action should be provided. The present individual permit system allows for more careful scrutiny of the environmental effects of projects.

We would like to offer the following editorial suggestions for your consideration:

Section 7c. Both applicable federal agencies were mentioned, so the applicable state agency should be named, specifically the Department of Land and Natural Resources.

Section 7e. The word "immediately" should be inserted before the word "revegetated" to ensure that erosion and siltation are minimized.

Section 7i. The phrase "in the immediate vicinity" should be deleted from the paragraph. Significant archaeological remains are likely to be found over a broader area of the site than is implied by the term "immediate vicinity".

Maps A-2 and A-3. Differences in scale and lack of detail including corresponding key street numbers make it difficult to comparatively evaluate the map/figures. In particular, there seems to be some inconsistency between Maps A-2 and A-3 in the labeling for Drop Ramps and Access Ramps.

Section 8. It is declared that an EIS is not necessary because the proposed actions covered under the general permit would have minimal adverse environment impacts. However, because the action will include activities in unimproved stream environments, a potential significant impact to pristine stream faunas can occur.

In conclusion, we concur with the Corps's proposal to issue a general permit for Type II ramps to already improved stream channels. However, it is our contention that some actions covered by the general permit may cause significant adverse secondary effects. Therefore, we urge that a full Environmental Assessment and Environmental Impact Statement, if necessary, be required for actions proposed in unimproved streams.

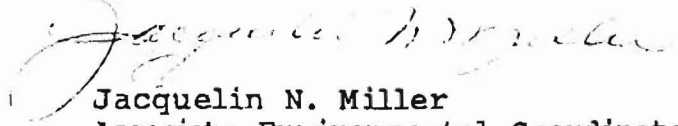
Mr. F. W. Wanner

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We appreciate the opportunity to comment on this proposal.

Yours truly,



Jacquelin N. Miller
Associate Environmental Coordinator

cc: OEQC

L. Stephen Lau
James Parrish
Randall Rush